

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SHANNON PHILLIPS,

Plaintiff,

v.

STARBUCKS CORPORATION d/b/a
STARBUCKS COFFEE COMPANY,

Defendant.

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Civil Action No. 1:19-cv-19432

Hon. Joel H. Slomsky, U.S.D.J.

Defendant Starbucks Corporation d/b/a Starbucks Coffee Company (“Starbucks”), by and
through its attorneys, submits the following Proposed Verdict Form.

Dated: May 22, 2023

Respectfully submitted,

/s/ Hannah M. Lindgren

Tara Param (*admitted pro hac vice*)
Hannah M. Lindgren (NJ No. 292082019)

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*Attorneys for Defendant,
Starbucks Corporation d/b/a
Starbucks Coffee Company*

Question No. 1

Has Ms. Phillips proved by a preponderance of the evidence that Starbucks discriminated against her because of her race when it terminated her employment?

Yes _____ No _____

If you answered "No" to this question, you have completed your deliberations and you must sign and date this form and return it to the Court Officer.

Proceed to the following question only if you answered "Yes" to Question 1.

Question No. 2

Has Ms. Phillips proved by a preponderance of the evidence that she suffered damages?

Yes _____ No _____

If your answer to Question 2 is "Yes," state the amount of damages, if any, you award to Ms. Phillips. When calculating the amount of damages, you must subtract the income Ms. Phillips actually earned following the termination of her employment and wages you determine that Ms. Phillips could have earned if she had used reasonable and diligent efforts to find other work, as she was required to do. If your answer to Question 2 is "No," write "0" in the space below.

\$ _____

Foreperson's Signature: _____

Date: _____